



Verdant Energy Pte. Ltd – Whistleblower Policy

1. Basis of the Policy

1.1 The Policy applies to Verdant Energy Pte. Ltd (“Verdant Energy” or “Manager”) incorporated and registered in Singapore. Additionally, the Policy applies to Verdant Energy’s Portfolio Companies and 100% owned holding and management companies set up. Any part of this document which applies to one entity will be specified as such.

1.2 These guidelines set out the Company’s Policy regarding the Whistleblower scheme obligations to comply with the following:

- The APMC Whistleblower Policy, reviewed and approved by the APMC Board of Directors on 22 November 2023.
- The Singapore Law, Prevention of Corruption Act 1960, revised in 2020.

1.3 The purpose of this Policy and procedure regarding the Whistleblower scheme is:

- To ensure, in practice, that the Company and Funds comply with the applicable regulations;
- To ensure that the Company remains a trustworthy company with an open corporate culture where everyone can freely express themselves, if they have knowledge of irregularities or violations committed by the Company’s Employees;
- To ensure that the Company always maintains and promotes honest and ethical performance, and ensures that financial legislation, industry standards and the Company’s own guidelines are met;
- To minimise any type of risk involved in non-compliance with regulations whether such risk may fall within criminal law, general law of damages or commercial transactions; and
- To describe the obligations of the Company and how violations or potential violations of the applicable law and regulations, can be reported anonymously.

1.4 The Policy is to be reflected and implemented in the procedures of the Company.



2. Basic principles

2.1 The Company is obliged to have a scheme whereby a Whistleblower, as defined in section 3, can report violations or potential violations of the applicable law and regulations and rules issued pursuant thereto, committed by the Company or the Employees of the Company or members of the Verdant Energy Board of Directors (“Board of Directors”), via a separate and independent channel.

2.2 Notifications to the Whistleblower scheme may be done anonymously if the Whistleblower chooses to do so.

2.3 The Company’s Whistleblower procedures shall ensure that enquiries provided through the Whistleblower scheme are acted upon in accordance with this Policy, and that the action taken is documented.

2.4 The Company must not expose the Whistleblower to unfavourable treatment or adverse consequences as a result of the Whistleblower having reported the Company's violation or potential violation of the applicable laws, regulations and rules issued pursuant thereto.

2.5 The Company is committed to ensure staff awareness of the Policy by referencing it in the new joiner onboarding pack, and via any other channel deemed appropriate by the Verdant Energy Executive Board of Management (“**Management**”) and/or the Compliance function.

2.6 The Company shall publish a clear statement of the Policy on its website.

3. Definitions

- Administrators: The ESG Manager of the Company acts as primary administrator of the Company’s Whistleblower system and the HR Manager as secondary administrator of the system.
- Responsible Board Member: The Board member appointed responsible via the Portal. See section 7 for further details.
- Portal: The Company’s Whistleblower scheme found at <https://verdant-energy.whistleblownetwork.co>, which allows for anonymous and encrypted communication between the Whistleblower and the Administrators. The Portal is available 24 hours a day, seven days a week.



- Suspected Abuse: A reasonable suspicion regarding the business of the Company in connection with:
 - a. an impending or actual criminal act;
 - b. an impending or actual breach of legislation or regulations;
 - c. knowledge or suspicion of a previous, current or possible future violation of the rules on money laundering and terrorist financing in connection with the Company, Fund, clients, employees, etc.;
 - d. serious, minor or potential violations that could cause the undertaking to receive an order or a reprimand from the supervisory authority;
 - e. an impending or actual communication of knowingly false information to a public body;
 - f. an impending or actual concealment, destruction or manipulation of information regarding these facts; or
 - g. other serious matters¹ such as discrimination, violence, harassment if it has a serious or recurring nature (including sexual harassment); whereby reporting may be restricted by local statutory obligations.

- Whistleblower: A natural person who reports or publishes information on violations that the person has gained access to in connection with his or her work-related activities and who belongs to the following groups of persons:
 - a. Employees and former employees of the Company and the Fund's investments;
 - b. Consultants and advisors;
 - c. Shareholders, Management, and Board of Directors;
 - d. Student trainees;
 - e. Volunteers; or
 - f. Persons working under the supervision and management of contractors, subcontractors and suppliers.



- Whistleblower Group: The CEO of the Company and the Administrators.

4. The Whistleblower

4.1 A Whistleblower has the right to report Suspected Abuse in the Company.

4.2 The Whistleblower may report any Suspected Abuse via the Portal.

4.3 The Whistleblower may choose to report the Suspected Abuse anonymously. All communication via the Portal will be encrypted and only accessible by the Administrators of the Portal. In case the Whistleblower did not report the Suspected Abuse anonymously, his/her name shall not be revealed, and information shall be provided in such a way that the anonymity of the Whistleblower is guaranteed as far as possible.

4.4 The Whistleblower shall treat the report and all related communication hereon as confidential and will not disclose any information to any third party inside or outside the Company, without the prior explicit permission of the Administrators. The restriction on disclosing confidential information is not intended to prevent the Whistleblower from reporting to government or regulatory agencies any concerns or issues, or from responding truthfully to questions or requests from those agencies or in a court of law.

4.5 Further, a Whistleblower may make a public disclosure where:

- a. the Whistleblower's reporting does not lead to appropriate action in response to a Whistleblower's report within the time limit;
- b. the Whistleblower reasonably believes the breach constitutes an imminent or obvious danger to the public interest; or
- c. the Whistleblower reasonably believes that there is a risk of retaliation or there is a low prospect of the breach being effectively addressed if reported through the Whistleblower Portal.

4.6 A Whistleblower who knowingly reports or publishes incorrect information may be subjected to a fine or higher penalty if applicable.



5. The Administrators

5.1 The Administrator will acknowledge receipt of the report made by the Whistleblower through the Portal within 7 days of receipt, unless the Whistleblower has expressly requested otherwise or there are reasonable grounds to believe that a confirmation of the report will jeopardize the protection of the Whistleblower's identity. The Whistleblower can monitor the status of the report that he/she filed via the Portal.

5.2 The Administrator will notify the Whistleblower Group immediately upon receipt of the report and will conduct a preliminary investigation and may request additional information from the Whistleblower via the Portal. If the report does not fall within the scope of the definitions of Whistleblower and Suspected Abuse, the Administrator may reject the report and is not obliged to forward to the Whistleblower Group.

5.3 The Administrator shall send the preliminary investigation to the Whistleblower Group for further investigation without undue delay.

5.4 All communication with the Whistleblower Group and the Whistleblower will be made via the Portal, and all reports and communication must be kept on the Portal for as long as is necessary.

5.5 The Administrators and Whistleblower Group have a duty of confidentiality regarding Whistleblower reports. The duty of confidentiality also applies to persons who may become aware of a Whistleblower report or the identity of a Whistleblower. The identity of the Whistleblower and other information may be shared with the Whistleblower's consent. In addition, such information may be shared with public authorities, if necessary, in accordance with the Whistleblowing Act.

6. The Whistleblower Group

6.1 The Whistleblower Group shall carry out an investigation without undue delay. The investigation shall be conducted in the way as the Whistleblower Group deems necessary.

6.2 The Whistleblower Group will, unless prohibited by legitimate interests of confidentiality, inform the Whistleblower via the Portal regularly on the progress of the investigation (within 3



months from confirmation of receipt, no later than 6 months in duly justified cases) and, upon completion thereof, the position of the Whistleblower Group regarding the reported Suspected Abuse, as soon as reasonably possible.

7. Responsible Board Member

7.1 The Whistleblower may report a Suspected Abuse to the Responsible Board Member via the Portal if:

- a. He/she is not satisfied with the position taken by the Whistleblower Group as referred to in Article 6.2;
- b. Suspected Abuse relates either to another member of the Board or to a member of the Whistleblower Group;
- c. A situation occurs in which the Whistleblower has reasonable cause to fear countermeasures as a result of the internal report; or
- d. There has been a previous internal report according to the procedures of a substantially similar abuse, which has not stopped the abuse.

7.2 The Responsible Board Member will respond on the report to the Whistleblower through the Portal. The Whistleblower can monitor the status of the report that he/she filed via the Portal.

7.3 The Responsible Board Member will conduct a preliminary investigation and may request additional information from the Whistleblower via the Portal.

7.4 The Responsible Board Member may determine based on the preliminary investigation that there are no grounds for Suspected Abuse and notify the Whistleblower thereof.

7.5 In case the preliminary investigation gives rise thereto, the Responsible Board Member may conduct further investigation with the Whistleblower Group or through engaging a third party.

7.6 Upon completion of the investigation, the Responsible Board Member will, unless prohibited by legitimate interests of confidentiality, inform the Whistleblower via the Portal of his position regarding the reported Suspected Abuse, as soon as reasonably possible.



8. Protection of rights

8.1 The position of a Whistleblower who, in accordance with the provisions of this Policy, has reported a Suspected Abuse in good faith² is not considered to have breached a statutory duty of confidentiality and shall not be prejudiced in any way whatsoever as a result of making such a report, regardless of whether the suspicion is refuted after investigation. This protection is extended to third parties who are connected to the Whistleblower and who risk being subjected to reprisals in a work-related context, or companies that the Whistleblower owns or works for or is otherwise associated with in a work-related context.

8.2 If a Whistleblower proves to have made a report or publication in line with the Policy and suffered a disadvantage, it is the Company's responsibility to prove that the disadvantage did not constitute retaliation as a result of the report. A Whistleblower who has been subjected to reprisals as a result of obtaining documentation or attempting to obtain documentation for information about violations is entitled to compensation.

9. Monitoring, surveillance and control

9.1 This Policy is subject to Compliance audits as part of the multi-annual Compliance review plan as approved by the Board of Directors, and at any other time when deemed necessary by the Compliance function. The Compliance function shall conduct reviews in line with the Company's Compliance Policy, and shall report findings, observations and recommended remediation to Management. Management shall decide on an action plan for remediation and oversee implementation by the relevant function.

9.2 If the compliance function deems the non-compliance as material or urgent, it shall immediately provide a report to the Board of Directors with a summary of the findings and Management's action plan.

9.3 In the event that the Board of Directors deems that this is not sufficiently complied with, the Board of Directors shall adopt a decision on how to remedy this and instruct Management, or where relevant the Compliance function, to implement such decision. The Board of Directors shall monitor that the action plan is complied with and that the plan is implemented as soon as possible.



9.4 The Board of Directors shall regularly, and at least once each year, evaluate whether this Policy as well as the monitoring, surveillance and control are sufficient and shall amend if deemed insufficient.

10. Owner, effective date and review

10.1 The Verdant Energy Board of Directors is the owner of this Policy.

10.2 The Policy will be reviewed by the Verdant Energy Board of Directors of the Company at least annually.

10.3 This Policy has been reviewed and approved by the Verdant Board of Directors on 26 September 2024.